

Before the
Federal Communications Commission
Washington, DC

RECEIVED

DEC 4 1995

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)
)
Amendment of Section 202(b),)
Table of Allotments,) RM-
FM Broadcast Stations)
(Imboden, Arkansas))

DOCKET FILE COPY ORIGINAL

DOCKET FILE COPY ORIGINAL

To: Chief, Allocations Branch

PETITION FOR RULEMAKING

John J. Shields ("Shields"), by its attorney, hereby requests that the Commission amend the Table of Allotments as follows:

<u>Community</u>	<u>Current</u>	<u>Proposed</u>
Imboden, AR	--	289A

In support thereof, the following is stated:

This channel can be allotted to Imboden in full accord with the Commission's spacing rules. Attached hereto is a Technical Statement which demonstrates that Channel 289A can be allotted to Imboden, Arkansas at 36° 14' 15" N, 91° 15' 03" W, which will prevent any shortspacing from occurring with any currently authorized or proposed facility.

Adoption of this proposal will be in the public interest. As demonstrated in the Technical Statement, approval of this proposal will allow Shields to provide first local service to Imboden, Arkansas.

Accordingly, Shields respectfully requests that this Petition be adopted, that the Commission amend the FM Table of Allotments to specify Channel 289A at Imboden, Arkansas, and that the Commission request comment on the proposal contained herein.

No. of Copies rec'd
List ABCDE

082
HMB

Respectfully submitted,

JOHN J. SHIELDS

By: 

Dan J. Alpert

Its Attorney

The Law Office of Dan J. Alpert
2120 N. 21st Rd.
Suite 400
Arlington, VA 22201
(703) 243-8690

December 1, 1995

ENGINEERING STATEMENT

Imboden, AR Channel 289A

The attached engineering study of channel 289A for Imboden, AR was performed using the Commission's separation criteria contained in 47 C.F.R. Section 73.207, 'Minimum Distance Separation Between Stations'. This study indicates that channel 289A can be assigned to Imboden, AR (1) with the reference point 7.5 kilometers Northwest (317 degrees) of the community (2). The proposed allocation point will avoid short-spacing KPNT, channel 289C, licensed to St. Genevieve, MO and KHOX, channel 287A, licensed to Hoxie, AR.

The FM Channel Spacing Study and Clearance Map, attached as Exhibit I and II, respectively, demonstrate that there is land northwest of Imboden, AR which will accommodate the site restriction and also provide for a tower site.

At maximum facilities (6 kw ERP; 100m HAAT), a class A city-grade contour will cover approximately 15.8 kilometers from the antenna site. Therefore, it is quite possible to provide Imboden, AR with the required city-grade coverage from a transmitter site within the clearance area shown on Exhibit II.

- (1) Imboden, AR center city coordinates:
N Lat: 36-12-09; W Long: 91-10-28
- (2) Proposed reference coordinates for channel 289A:
N Lat: 36-14-15; W Long: 91-15-03

Conclusion

This proposal meets the separation requirements of Section 73.207 for all existing FM assignments. It also meets the city-grade coverage requirements of Section 73.315 since adequate land is available within the clearance area to provide the principal community with city-grade coverage. Furthermore, the public interest will be served by allocating channel 289A to Imboden, AR as its first commercial FM facility.

EXHIBIT I

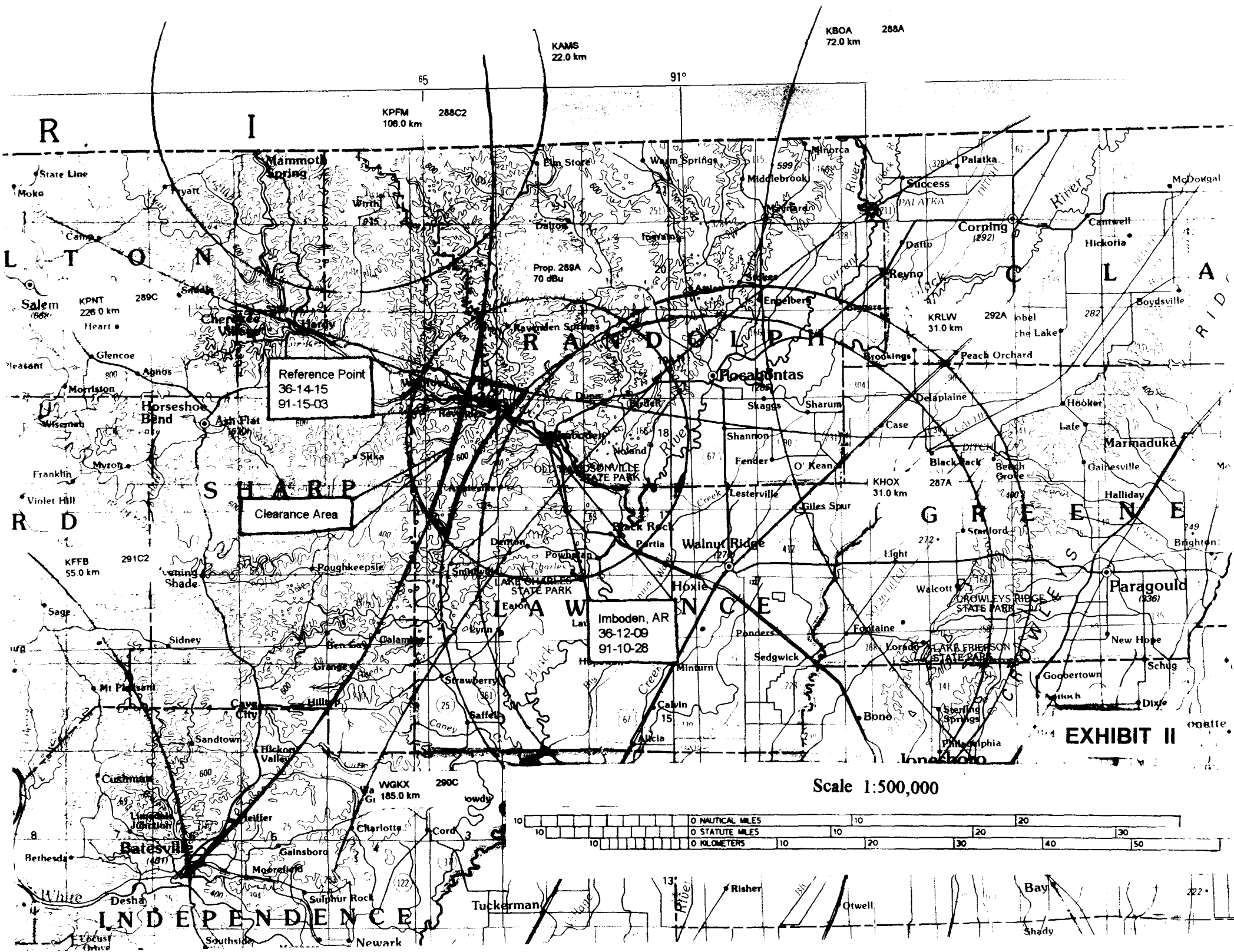
***** FM CHANNEL SPACING STUDY *****

Job title: Imboden, AR Reference Pt.
Channel: 289A

Latitude: 36 14 15
Longitude: 91 15 3

CH	Call	Record	City	ST	Status	Bear.	Dist.	Reqd. Dist.	Result
290C	WGKX	10714	Memphis	TN	LIC	132.6	176.5	165.0	11.5
289A	WWUC	10757	Union City	TN	LIC	79.9	193.8	115.0	
292A	KRLWFM	11382	Walnut Ridge	AR	LIC	124.2	33.8	31.0	2.8
288A	KBOAFM	11383	Piggott	AR	LIC	83.9	102.5	72.0	30.5
287A	KHOX	11386	Hoxie	AR	LIC	132.7	32.4	31.0	1.4
289C	KPNT	11455	St. Genevieve	MO	LIC	14.6	227.5	226.0	1.5
236C1	KAMS	11864	Mammoth Spring	AR	LIC	335.1	37.9	22.0	15.9
291C2	KFFB	12395	Fairfield Bay	AR	LIC	238.6	106.8	55.0	
288C2	KPFM	12426	Mountain Home	AR	LIC	285.0	110.0	106.0	4.0
289C1	KMCK	13521	Siloam Springs	AR	LIC	269.7	274.0	200.0	

***** End of channel 289 study *****



Reference Point
36-14-15
91-15-03

Clearance Area

Imboden, AR
36-12-09
91-10-28

EXHIBIT II

Scale 1:500,000

